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October 24, 2006

Clerk of the Board  
Air Resources Board  
1001 I Street  
P.O. Box 2815  
Sacramento, California 95812

Subject: Rubber & Vinyl Protectant Definition

Dear Clerk of the Board,

BAF is a California company that markets automotive specialty products. These automotive specialty products consist of appearance type products.

The proposed definition change in the Technical Support Document will have a substantial impact tire coating products. Tire coatings should be regulated as aerosol coating products using the MIR limit in the coating regulation because tire coating product unlike typical tire dressings contains a resin and produces a film. Current tire coating products can not be produced at the VOC limit for Rubber and Vinyl Protectant, thus this change will ban products already in commerce.

BAF requests that this issue be deferred until the next survey as originally posted in the 2003 survey document.

Thank you for your time and consideration to this issue.

Sincerely,

  
Michael Bell  
Operation Manager

cc: Robert D. Fletcher, P.E., Division Chief, Stationary Source Division  
Robert D. Barham, Ph.D., Assistant Division Chief, Stationary Source Division  
Janette M. Brooks, Chief, Air Quality Measures Branch, Stationary Source Division  
David Mallory, Manager, Measures Development, Stationary Source Division

Rec'd 10/27/06  
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